

146

Wes Burtley 11 file 15

STATE OF KANSAS



DEPARTMENT OF HEALTH AND ENVIRONMENT

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Topeka, Kansas 66620-0001

Phone (913) 296-1500

Mike Hayden, Governor

Stanley C. Grant, Ph.D., Secretary

Gary K. Hulett, Ph.D., Under Secretary

February 1, 1988

Mr. David Trombold
Sales Manager
Hydrocarbon Recyclers, Inc.
2525 North New York
Wichita, Kansas 67219

Re: Frequency of Detailed Sampling
EPA I.D. Number KSD007246846

Dear Mr. Trombold:

I have reviewed the summary of analyses performed on each waste used in the various disposal processes performed by HRI. Based upon this data, the confirmation analysis should be sufficient for those waste streams which do not show changes in their characteristics. The annual detailed waste analysis may be waived for these types of waste streams.

A detailed waste analysis should be performed on a generator's waste when the confirmation analysis shows a change in waste composition or when the generator notifies HRI of a change in their waste stream. A detailed waste analysis should be performed on all new waste streams which are received by HRI. An annual detailed waste analysis should be performed on those waste streams which have a history of changes in composition without the generator notifying HRI.

In our phone conversation on January 22, 1988, you asked if it would be possible for HRI to use a tanker as temporary storage for waste during the transfer to the new facility. The use of a tanker in this manner would make it part of the waste storage facility. The tanker would be considered a new hazardous waste tank. The tanker and attendant piping would be required to meet the criteria set for new hazardous waste tank systems. HRI would also be required to modify its interim status in order to include the new tank as part of the facility. In view of these complications involved in using the tanker, we strongly suggest that an alternative be found.

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PRMT SECTION



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RCRA Records Center

Mr. David Trombold
February 1, 1988
Page 2

If you have any questions, please feel free to call me at (913) 296-1613.

Sincerely yours,

Martin West

Martin L. West
Environmental Engineer
Hazardous Waste Section
Bureau of Waste Management

sc/trombold

C Wes Bartley ✓
Dale Stuckey